

2524

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are commanded to summons ELIZA AUSTIN, to appear, and plead, answer or demur within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Issac Austin, as Complainant and against Eliza Austin, as Respondent.

WITNESS Register of said Court, this the 9th day of August, 1950.

Reis J. Wacker
Register

ISSAC AUSTIN

COMPLAINANT

VS

ELIZA AUSTIN

RESPONDENT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

TO HONORABLE TELFAIR J. MASHEURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Issac Austin, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.

2.

That your Complainant and the Respondent married at Bay Minette, Alabama, in 1927 and lived together as husband and wife until in April, 1949.

3.

That in April, 1949, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.

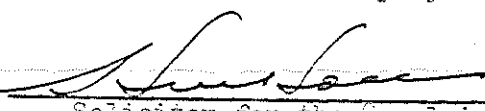
4.

That there was born to the marriage between your Complainant and the Respondent, one child, Gartrell Austin, a girl ten years of age; that the said Complainant is the suitable, fit and proper person to have the care,

custody and control of the said child; that the Respondent is not a suitable person to have her custody.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process, make the said Eliza Austin, party Respondent to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that your Honor will, upon a hearing hereof, enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that a decree be made awarding to him the custody, care and control of the child, Gartrell Austin; Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.


Solicitor for the Complainant

Received in Sheriff's Office
this 2 day of Aug, 1950
TAYLOR WILKINS, Sheriff

RECORDED
702524

dated Aug 11 1950
giving copy of within Summons and
complaint on

Eliza Austin

ISSAC AUSTIN

COMPLAINANT

VS

ELIZA AUSTIN

RESPONDENT

Taylor Wilkins Sheriff
by W. F. Hall Deputy Sheriff

BILL OF COMPLAINT

FILED

AUG 9 1950

ALICE J. DUCK, Register

1030